and wherein the wheel drive motors for the wheels on the second end of the frame are connected in series to each other, to the fluid source, and to the wheel drive motors on the first end of the frame.

30. A vehicle as recited in claim 15, wherein only a single wheel is carried adjacent the second end of the frame.

C3 Cont

31. A vehicle as recited in claim 15, further including means operatively connected to the wheel(s) on the second end of the frame to allow such wheel(s) to overrun the hydraulic motors driving such wheel(s) when required during turns of the vehicle.

D

32. A vehicle as recited in claim 31, wherein such overrunning means comprises a mechanical clutch operatively connected between a drive shaft of each hydraulic motor driving each wheel(s) on the second end of the frame and a wheel hub of each wheel(s) on the second end of the frame.--

Claim 27, Line 1, change "claim 26" to --claim 29--.

Remarks

Independent claim 20 has been amended herein for grammatical reasons to account for the fact that one or more than one rear drive wheel, and thus one or more than one rear wheel drive motor, might be present. As previously written, the claim called for "...the wheel drive motor(s) for the rear wheel(s) **is** connected..." Use of the word "is" grammatically is appropriate only when one wheel drive motor for one rear wheel is present and is not appropriate

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when more than one wheel drive motor for more than one rear wheel is present, with both configurations being encompassed by the claim. Thus, the word "is" has been changed to "being" such that the claim now reads, in pertinent part, "...the wheel drive motor(s) for the rear wheel(s) being connected..." Accordingly, claim 20 is now grammatically correct regardless of how many rear drive wheels, and correspondingly how many rear wheel drive motors, are present on the apparatus.

Independent claim 26 has been amended in a generally similar fashion for grammatical reasons. Changing the word "are" to "being" and deleting the phrase "to each other" ensures that claim 26 is grammatically correct regardless of how many second end drive wheels, and correspondingly how many second end wheel drive motors, are present on the apparatus. In addition, claim 26 has been further amended to remove a limitation concerning the recited "operating unit" that does not appear to be essential to patentability. While the claim still requires the presence of "at least one operating unit carried on the frame for performing a turf maintenance operation", such a unit need not engage the ground during a turf maintenance operation.

In each of claims 20 and 26, the phrase "are connected" used in describing the parallel connection of the wheel drive motors on the front or first end of the frame, respectively, has been changed to "being connected" to be consistent with the use of the same phrase earlier in the claim, as described above.

Various additional dependent claims have been added dependent from claim 26. Such dependent claims add further features of the invention to claim 26, and are being submitted to more fully protect the Applicants' invention.

With respect to the substance of the Examiner's prior art rejections, such rejections are respectfully traversed.

The Examiner has misread the Benko reference. Benko does not show or suggest the claimed serial/parallel hydraulic drive arrangement, but merely shows an all parallel drive motor connection of the type old and well known in the art and as acknowledged by the Applicants as prior art. Essentially, Benko shows nothing more than what has been described as prior art by the Applicants in the Toro Reelmaster 216 product.

A portion of Fig. 1 of Benko is reproduced below for the Examiner's convenience. Looking at this figure and tracing the hydraulic drive system, the fluid source for the wheel motors 48 comprises the supply line marked in yellow, which line merely branches into three separate supply lines for supplying each of the wheel motors 48 **in a parallel arrangement.** The system uses a common return line from these motors 48, highlighted in pink, simply connected to a line from each motor for returning the fluid to the source.

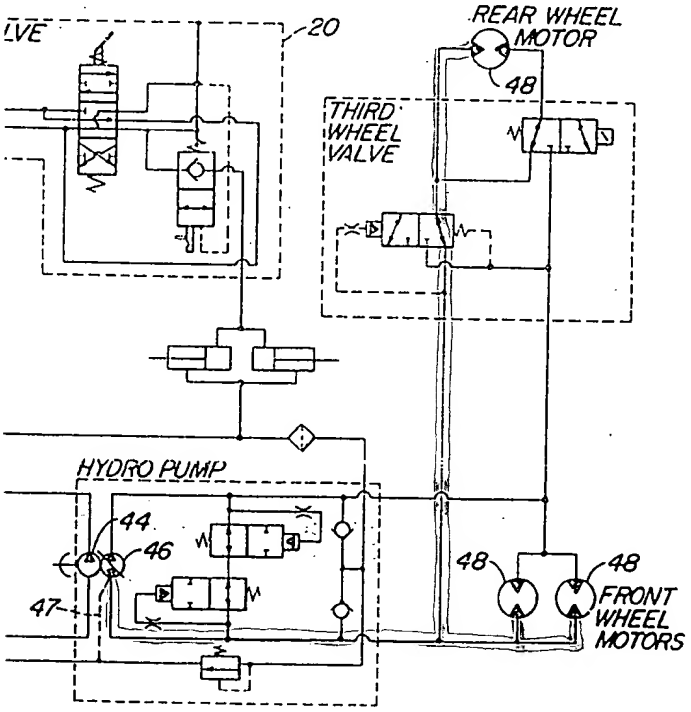


FIG. 1

Benko only appears to disclose a serial/parallel arrangement due to how the front and rear wheel motors are laid out on the page of his Fig. 1. Clearly, the two front wheel motors are next to one another in what is clearly a parallel connection. The rear wheel motor is at the top of the page and is connected to the front wheel motors by a supply line, but this supply line is a connection to the main supply line connecting the fluid source to **the input of the rear wheel motor**. Thus, this is nothing more than another branch in a purely conventional all parallel connection. It is not the claimed serial/parallel connection in which all of the flow from the source is directed without branching through at least one serially connected drive motor on one end of the frame after or before passing through a set of parallel connected drive motors on the other end of the frame.

Accordingly, any rejections based primarily on Benko must be discarded. Benko simply does not teach what the Examiner thinks it does.

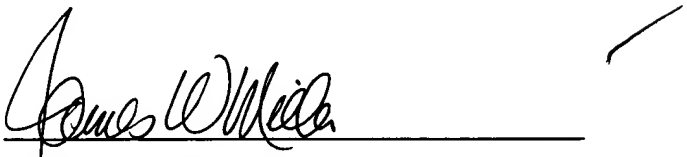
Given the proper interpretation of Benko, the rejections based upon the Reelmaster 3500-D brochure should also be withdrawn. In the Reelmaster 3500-D, the front and rear drive wheels are not individually driven by individual wheel drive motors as set forth in the claim, but are instead driven as a pair using a hydraulically driven transaxle that provides a differential action. Inherently, such a product does not and cannot teach a pair of drive wheel motors on end of the frame that are connected to each other in parallel. Moreover, such a product does not teach or suggest connecting such a set of parallel drive wheel motors in a serial fashion to individual drive wheel motors, either one or two such motors, on the other end of the frame. And, for the reasons noted above, Benko does not

supply what the Reelmaster 3500-D lacks. Benko does not teach or suggest to one skilled in the art the modifications to the Reelmaster 3550-D needed to meet the terms of the claims.

The art clearly teaches mowers and vehicles of the type claimed in which individual wheel drive motors are used in conjunction with each drive wheel of the apparatus, thereby avoiding the use of transaxles, differentials and the like. In addition, the art teaches connecting such motors in parallel to one another and to the fluid source. However, the art does not teach or suggest the unique parallel/serial combination for such individual wheel drive motors that is recited in the claims. As established above, Benko simply shows an all parallel connection and the Reelmaster 3500-D shows transaxles for driving the wheels in pairs. This invention, which discovers the traction advantages provided by a parallel/serial connection for individual wheel drive motors and thus solves a traction problem plaguing prior art mowers and vehicles of the type claimed, is a new, useful and non-obvious advance in the art.

It is respectfully requested that this application be allowed and sent to issue.

Respectfully submitted,



July 5, 1995

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